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December 16, 2021

VIA ECF

Hon. William F. Kuntz, II
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Joint Request for extension to file joint pre-trial order to February 18, 2022.

Rivera et al. v. Financial Asset Management Systems, Inc., Case No. 1:17-cv-01295-WFK-RML

Dear Judge Kuntz:

The undersigned represents Plaintiffs Diandra Rivera and Jeanette Vega in this Fair Debt Collection Practices Act and NY General Business Law case. On September 25, 2020, Your Honor granted and denied in part Plaintiffs' Motion for Summary Judgment. *See* DE 76. And on November 4, 2021, Your Honor denied Plaintiffs' Request for Leave to File a Second Motion for Summary Judgment. DE 83. Accordingly, per Your Honor's Individual Rules, Plaintiff has assumed a joint pre-trial order was due within 60 days of Your Honor's November 4 Order – on January 3, 2022.

However, due to the holidays and pressing matters in other cases, the parties now request an extension on this deadline from January 3, 2022 to February 18, 2022. No other deadlines have been set yet for this matter so the extension will not affect any other deadlines. This is the first request for an extension of this deadline.

Respectfully submitted,

/s/

Ahmad Keshavarz

cc: Opposing counsel via ECF

SO ORDERED.

s/ WFK

Dated: December 16, 2021
Brooklyn, New York

HON. WILLIAM F. KUNTZ, II
UNITED STATES DISTRICT JUDGE